

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

OLD LADDER LITIGATION CO., LLC,

Plaintiff,

v.

INVESTCORP BANK B.S.C. et al.

Defendants.

No. 1:08-cv-0876 (RMB-THK)

**MOTION TO ADMIT COUNSEL  
PRO HAC VICE**

U.S. DISTRICT COURT  
2008 MAR 18 AM 1:22  
S.D.N.Y.  
FILED

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Eric J. Grannis, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

**Applicant's Name:** David John Teklits

**Firm Name:** Morris, Nichols, Arsh & Tunnell LLP

**Address:** Chase Manhattan Centre, 18th Floor  
1201 North Market Street

**City/State/Zip:** Wilmington, Delaware 19899-1347

**Phone Number:** (302) 351-9292

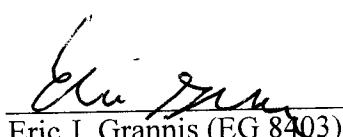
**Fax Number:** (302) 498-6212

David John Teklits is a member in good standing of the Bar of the States of Delaware. There are no pending disciplinary proceedings against David John Teklits in any State or Federal court.

Dated: New York, New York  
March 17, 2008

LAW OFFICES OF ERIC J. GRANNIS

By:

  
Eric J. Grannis (EG 8403)

620 Fifth Avenue  
New York, New York 10020  
(212) 903-1025  
Attorneys for Defendant Loughlin Meghji &  
Co., Inc.

MAR 18 2008

002 025-645652

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

OLD LADDER LITIGATION CO., LLC,

Plaintiff,

v.

INVESTCORP BANK B.S.C. et al.

Defendants.

No. 1:08-cv-00876 (RMB-THK)

**DECLARATION OF ERIC  
GRANNIS IN SUPPORT OF  
MOTION TO ADMIT COUNSEL  
PRO HAC VICE**

State of New York )

)

County of New York ) ss:

Eric Grannis, being duly sworn, hereby deposes and says as follows:

1. I am counsel for Defendant Loughlin Meghji & Co., Inc. ("Loughlin") in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Loughlin's motion to admit David John Teklits as counsel pro hac vice to represent Loughlin in this matter.

2. I am a member in good standing of the bar of the State of New York and was admitted to practice law on July 2, 1996. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. Mr. Teklits is a partner at Morris, Nichols, Arsh & Tunnell LLP in Wilmington, Delaware.

4. I have found Mr. Teklits to be a skilled attorney and a person of integrity.

He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

5. Accordingly, I am pleased to move the admission of David John Teklits, pro hac vice.

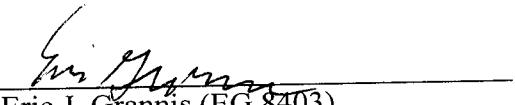
6. I respectfully submit a proposed order granting the admission of David John Teklits, pro hac vice, which is attached hereto as Exhibit A.

7. I respectfully submit a certificate of good standing for David John Teklits, which is hereto attached as Exhibit B.

WHEREFORE it is respectfully requested that the motion to admit Curtis S. Miller, pro hac vice, to represent Defendant Loughlin in the above captioned matter, be granted.

Dated: New York, New York  
March 17, 2008

LAW OFFICES OF ERIC J. GRANNIS

By:   
Eric J. Grannis (EG 8403)  
620 Fifth Avenue  
New York, New York 10020  
(212) 903-1025

*Attorneys for Defendant Loughlin Meghji & Co., Inc.*

**EXHIBIT A**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

OLD LADDER LITIGATION CO., LLC,

Plaintiff,

No. 1:08-cv-0876 (RMB-THK)

v.

INVESTCORP BANK B.S.C. et al.

Defendants.

**ORDER FOR ADMISSION  
PRO HAC VICE  
ON WRITTEN MOTION**

Upon the motion of Eric J. Grannis, attorney for Loughlin Meghji & Co. and said sponsor attorney's affidavit in support;

**IT IS HEREBY ORDERED** that

**Applicant's Name:** David John Teklits  
**Firm Name:** Morris, Nichols, Arnsht & Tunnell LLP  
**Address:** Chase Manhattan Centre, 18th Floor  
1201 North Market Street  
**City/State/Zip:** Wilmington, Delaware 19899-1347  
**Phone Number:** (302) 351-9292  
**Fax Number:** (302) 498-6212

is admitted to practice pro hac vice as counsel for Loughlin Meghji & Co. in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:  
City, State: New York, New York

\_\_\_\_\_  
United States District/Magistrate Judge

**EXHIBIT B**

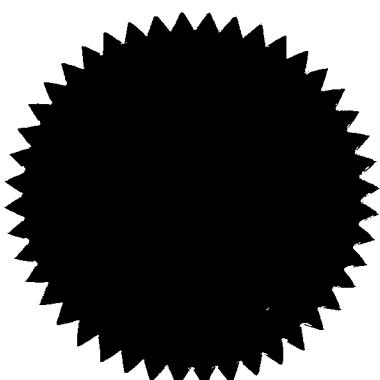
## **SUPREME COURT OF THE STATE OF DELAWARE**

### **CERTIFICATE OF GOOD STANDING**

The Clerk of the Supreme Court of the State of Delaware, the highest Court in the State, certifies that **David John Teklits** was admitted to practice as an attorney in the Courts of this State on **December 16, 1993** and is an **active** member of the Bar of the Supreme Court of the State of Delaware in good standing.

### **IN TESTIMONY WHEREOF,**

I have hereunto set my hand and affixed the seal of said Court at Dover this 10th day of March 2008.



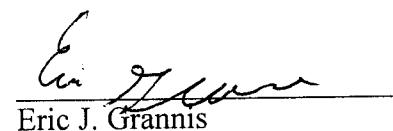
Cathy L. Howard  
Cathy L. Howard  
Clerk of the Supreme Court

AFFIRMATION OF SERVICE

I, Eric J. Grannis, hereby affirm that I am a member of the Bar of this Court and that on March 17, 2008, I served by First Class mail a copy of the attached document upon all appearing parties:

J. Christopher Shore, Esq.  
White & Case LLP  
1155 Avenue of the Americas  
New York, New York 10036

James J. Lotz, Esq.  
Foley & Mansfield, PLLP  
485 Madison Avenue  
New York, New York 10022



Eric J. Grannis